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Best Practice Quality LLC
2810 E Hidalgo Ave
Phoenix AZ 85040

April 28, 2025

Office of the Secretary,
Consumer Product Safety Commission,
4330 East West Highway,
Bethesda, MD 20814;
telephone: (301) 504–7479.

Subject: Comment on Notice of Proposed Rulemaking – NEISS Data Collection (Docket No. CPSC-2024-0012)

To Whom It May Concern:

I appreciate the opportunity to provide comments on the Consumer Product Safety Commission's (CPSC) Notice of Proposed Rulemaking concerning the National Electronic Injury Surveillance System (NEISS) data collection. I am submitting these comments as an individual who has been actively involved in standards development and product safety conversations through participation in ASTM and JPMA communities.

I commend the Commission's efforts to reassess the NEISS data collection process and welcome the opportunity to support improvements that enhance the practical utility and clarity of the data. I would like to focus my comments on a critical area that I believe deserves increased attention: improving the quality and utility of NEISS data.

Known Limitations and Gaps in Current Data

A recurring topic of discussion within ASTM and JPMA meetings has been the lack of meaningful product-specific detail in NEISS reports. While NEISS has been a valuable tool for identifying injury trends, there are persistent gaps that limit the utility of the data for root cause analysis, standards development, and regulatory decision-making. Notable concerns include:

- Insufficient context regarding the product's role in the injury (e.g., was the product in active use at the time of injury or merely present in the environment?)

- Lack of information on the product's lifecycle (e.g., new vs. secondhand, age of the product)

- Limited identifying details such as brand, model, tracking label information, or batch/lot data, which are crucial for linking injuries to specific product types or versions.

Without these key data points, it is difficult to distinguish between incidents tied to design issues versus those resulting from misuse, age-related wear, or improper assembly.

Suggestions for Improvement

To address these challenges and enhance the clarity and utility of NEISS data, I encourage the CPSC to consider the following recommendations:

1. Expand the scope of collected data fields to include product identifiers (brand, model, tracking label), usage context (active use vs. passive presence), and product condition (new, secondhand, age).

2. Incorporate structured prompts for hospital personnel to guide consistent and comprehensive responses related to product involvement.

3. Leverage modern data collection technologies (e.g., tablet-based systems, AI-assisted coding, barcode scanning of tracking labels) to reduce reporting burden while improving accuracy.

4. Collaborate with stakeholders such as ASTM committees and industry groups to refine the data taxonomy and align NEISS inputs with evolving product safety standards.

A Phased, Collaborative Path Forward

Given the scope of potential changes, I support the idea of a phased improvement plan, beginning with a pilot study or demonstration project to evaluate the feasibility of proposed enhancements. In addition, I recommend that the Commission consider issuing a revised NPR after gathering stakeholder input, allowing the public to provide informed comment on a more detailed proposal.

In conclusion, improving NEISS data quality is essential to ensuring that both regulators and stakeholders can make informed decisions based on sound, relevant, and actionable information. I appreciate the Commission's openness to feedback and look forward to continued dialogue on this important issue.

Sincerely,

Rachael Shagott
President, Best Practice Quality, LLC
Tel: 310.740.3626
rshagott@bpqCONSULT.com

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